

# **EXHIBIT K**

(Lenahan Declaration)

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9 *Lighting, LLC, Lowe's Home Centers,*  
10 *LLC and Home Depot USA, Inc.*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14

15 DS ADVANCED ENTERPRISES, LTD.,  
16 A CORPORATION

17 Plaintiff,  
18 v.

19 COOPER LIGHTING, LLC,  
20 LOWE'S HOME CENTERS, LLC,  
HOME DEPOT USA, INC,

21 Defendants.  
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**Case No. 5:23-cv-02603**

**DECLARATION OF DENNIS J.  
LENAHAN IN SUPPORT OF  
DEFENDANTS' MOTION TO STAY  
AND MOTION TO TRANSFER**

1 I, Dennis J. Lenahan, declare as follows:

2 1. I am the Vice President of Merchandising - Electrical • Building &  
3 Maintenance Management at Lowe's Home Centers, LLC ("Lowe's), where I have  
4 worked for 22 years. I have personal knowledge of the facts stated in this Declaration,  
5 and, if called to testify, could and would testify competently under oath to these facts.

6 2. I understand that Plaintiff accuses the CJB Integrated JBox Downlights  
7 (Model Number: CJB6099FS1EMWR) of infringement in this case (the "Accused  
8 Product").

9 3. Lowe's is a retail company that specializes in reselling home improvement  
10 products. Lowe's is headquartered in Mooresville, North Carolina with a corporate  
11 address at 1000 Lowe's Boulevard Mooresville, North Carolina 28117.

12 4. Lowe's operates various retail locations Georgia. These locations include,  
13 but are not limited to, Lowe's Home Improvement stores at 3625 N. Commerce Drive,  
14 East Point, Georgia 30344 and 1280 Caroline Street, NE, Atlanta, Georgia 30307.

15 5. Lowe's buys the Accused Product from, and only from, Cooper Lighting,  
16 LLC.

17 6. Lowe's purchases the Accused Product and resells it without any  
18 modification. In other words, Lowe's does not modify or change the Accused Product,  
19 its packaging, or any part of the device before offering it for sale or selling it to a  
20 customer.

21 7. To the extent Lowe's has any relevant documents or employees with  
22 knowledge about advertising, marketing, or sales of the Accused Product, those  
23 documents and potential witnesses are located at its headquarters in Mooresville, North  
24 Carolina. For example, marketing and sales personnel responsible for the Accused  
25 Product are located at Lowe's headquarters in Mooresville, North Carolina.

1 I declare under penalty of perjury that the foregoing is true and correct.

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3 Executed on this 30th day of September, 2024 in Mooresville, North Carolina.

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6 Dennis J. Lenahan  
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